

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL INC.,
et al.,

*Plaintiffs,
Counterclaim-Defendants,*

vs.

CIVIL ACTION NO. 04-1338 (KAJ)

APPLE COMPUTER INC., et al.,

*Defendants,
Counterclaim-Plaintiffs.*

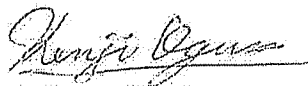
**DECLARATION IN SUPPORT OF ST-LCD's MOTION TO
DISMISS FOR LACK OF PERSONAL JURISDICTION**

I, Kenji Ogura, declare as follows:

1. I am currently President of ST Liquid Crystal Display Corporation ("ST-LCD").
2. ST-LCD was established in 1997 through a 50/50 joint venture between Toyota Industries Corporation and Sony Corporation.
3. ST-LCD maintains its own executive team. ST-LCD's executive team is responsible for the day-to-day management of ST-LCD.
4. ST-LCD maintains its own board of directors. The board of directors of ST-LCD is responsible for oversight of ST-LCD.
5. ST-LCD is organized under the laws of Japan and has its principal offices located at 50 Ogawa Azakamifunaki, Higashiura-cho, Chita-gun in Aichi-Prefecture, Japan.
6. ST-LCD manufactures liquid crystal display panels and modules ("LCDs") at its facility in Japan.
7. ST-LCD does not manufacture any goods in the State of Delaware or anywhere else in the United States.
8. ST-LCD does not sell, advertise or trade any goods or services in the State of Delaware or anywhere else in the United States.

9. ST-LCD does not import any goods into the United States.
10. ST-LCD does not maintain any offices or any other facilities in the State of Delaware or anywhere else in the United States.
11. ST-LCD does not own any property in the State of Delaware or anywhere else in the United States.
12. ST-LCD does not maintain any bank accounts in the State of Delaware or anywhere else in the United States.
13. ST-LCD has never commenced any legal action in the State of Delaware or been named as a defendant in any action in Delaware, except the current litigation.
14. ST-LCD has never paid taxes in the State of Delaware or anywhere else in the United States.
15. ST-LCD has never contracted to supply services or things in the State of Delaware or anywhere else in the United States.
16. ST-LCD has 1,048 employees, all of whom reside outside the United States.
17. ST-LCD has not contracted to insure or to act as a surety for any person, property or agreement relating to Delaware.
18. Sony Corporation purchases all of ST-LCD's output of LCDs; the purchase of the LCDs occurs in Japan.
19. ST-LCD does not have any authorized distributors of its LCDs in the State of Delaware or anywhere else in the United States.
20. ST-LCD's website is written in Japanese; ST-LCD provides no English translation of its website that is accessible via the Internet.
21. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 9, 2006



Kenji Ogura
President, ST Liquid Crystal Display Corporation

CERTIFICATE OF SERVICE

I, John W. Shaw, hereby certify that on February 10, 2006, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such document is available for viewing and downloading to the following counsel of record:

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I further certify that on February 10, 2006, I caused copies of the foregoing documents to be served by hand delivery on the above-listed counsel of record and on the following counsel in the manner indicated:

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